UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA, : Case No. 3:15CR148(2)

Plaintiff,

vs.

18 U.S.C. § 1957

CONNIE APOSTELOS,

Defendant.

The United States Attorney charges:

COUNT ONE

[18 U.S.C. § 1957]

On or about October 1, 2014, in the Southern District of Ohio, defendant CONNIE M. APOSTELOS and William Apostelos, aiding and abetting each other, knowingly engaged and attempted to engage in a monetary transaction - namely, the deposit of a check in the amount of \$224,747.98 at Key Bank - affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activities - namely, mail fraud in violation of Title 18, United States Code, Section 1341, and wire fraud in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Sections 1957 and 2.

BENJAMIN C. GLASSMAN United States Attorney

BRENT G. TABACCHI

Assistant United States Attorney